

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**BCS SOFTWARE, LLC,**

**Plaintiff**

**v.**

**ZOHO CORPORATION**

**Defendant**

**Case No. 6:21-cv-0051-ADA**

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION TO EXTEND DEADLINES FOR PLAINTIFF'S RESPONSE  
AND DEFENDANT'S REPLY TO DEFENDANT'S MOTION TO TRANSFER**

BCS Software, Inc. ("Plaintiff") moves the Court for an extension of the deadline for Plaintiff to file a response and Defendant to file a reply to Defendant's Motion to Transfer ("Motion"). Defendant filed its Motion on March 31, 2021 [Dkt. No. 14]. Plaintiff's response to the Motion is currently due on May 5, 2021 [Dkt. No. 18]. Pursuant to the Court's November 19, 2020 Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases and to allow the Parties to address venue discovery related to the allegations set forth in Defendant's motion to transfer to the Austin Division of the Western District of Texas, the Parties have stipulated and agreed to extend the deadline for Plaintiff to respond to the Motion to be up to two weeks after the completion of venue discovery, and to extend the deadline for Defendant to reply to be up to two weeks after Plaintiff's response. Venue discovery will be completed before or on July 30, 2021. The parties will notify the Court when such discovery is completed. Plaintiff agrees that it will not rely on this extension in any way as a reason to deny the Motion.

Accordingly, as stipulated and agreed by the Parties, Plaintiff respectfully requests the deadline for Plaintiff's response to Defendant's Motion to be up to two weeks after the completion of venue discovery, and that the deadline for Defendant's reply be up to two weeks after Plaintiff's response. Venue discovery will be completed before or on July 30, 2021.

Dated: May 5, 2021

Respectfully Submitted

/s/ M. Scott Fuller

Thomas Fasone III  
Texas Bar No. 00785382  
tfasone@ghiplaw.com  
M. Scott Fuller  
Texas Bar No. 24036607  
sfuller@ghiplaw.com  
Randall T. Garteiser  
Texas Bar No. 24038912  
rgarteiser@ghiplaw.com

**GARTEISER HONEA, PLLC**

119 W. Ferguson Street  
Tyler, Texas 75702  
Telephone: (903) 705-7420

/s/ Raymond W. Mort, III

Raymond W. Mort, III  
Texas State Bar No. 00791308  
raymort@austinlaw.com

**THE MORT LAW FIRM, PLLC**

100 Congress Ave, Suite 2000  
Austin, Texas 78701  
Tel/Fax: (512) 865-7950

**ATTORNEYS FOR PLAINTIFF  
BCS SOFTWARE, LLC**